

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

B.P.J., by her next friend and mother, HEATHER  
JACKSON,

*Plaintiff,*

v.

Civil Action No. 2:21-cv-00316  
Hon. Joseph R. Goodwin, District Judge

WEST VIRGINIA STATE BOARD OF  
EDUCATION, HARRISON COUNTY BOARD  
OF EDUCATION, WEST VIRGINIA  
SECONDARY SCHOOL ACTIVITIES  
COMMISSION, W. CLAYTON BURCH in his  
official capacity as State Superintendent,  
DORA STUTLER in her official capacity as  
Harrison County Superintendent, PATRICK  
MORRISEY in his official capacity as Attorney  
General, and THE STATE OF WEST VIRGINIA,

*Defendants.*

**CERTIFICATE OF SERVICE**

I hereby certify that on 22<sup>nd</sup> day of November, 2021, I electronically filed the foregoing Certificate of Service of “Defendants Harrison County Board of Education and Dora Stutler’s Answers and Objections to Plaintiff’s First Set of Interrogatories to Defendants Harrison County Board of Education and Dora Stutler” with the Clerk of the Court using the CM/ECF system, and a true and exact copy of such filing was sent by United States Mail, first class, postage prepaid, addressed to the following counsel of record:

**Andrew D. Barr, Esquire**  
COOLEY  
Suite 2300  
1144 15th Street  
Denver, CO 80202  
*Counsel for Plaintiff*

**Joshua A. Block, Esquire**  
AMERICAN CIVIL LIBERTIES UNION  
Floor 18  
125 Broad Street  
New York, NY 10004  
*Counsel for Plaintiff*

**Tara L. Borelli, Esquire**  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND  
158 West Ponce De Leon Avenue, Suite 105  
Decatur, GA 30030  
*Counsel for Plaintiff*

**Kathleen R Hartnett, Esquire**  
COOLEY  
5th Floor  
101 California Street  
San Francisco, CA 94111  
*Counsel for Plaintiff*

**Elizabeth Reinhardt, Esquire**  
COOLEY  
500 Boylston Street  
Boston, MA 02116  
*Counsel for Plaintiff*

**Loree Beth Stark, Esquire**  
AMERICAN CIVIL LIBERTIES UNION OF  
WEST VIRGINIA  
Suite 507  
405 Capitol Street  
Charleston, WV 25301  
*Counsel for Plaintiff*

**Sruti J. Swaminathan, Esquire**  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND  
19th Floor  
120 Wall Street  
New York, NY 10005  
*Counsel for Plaintiff*

**Douglas P. Buffington, II, Esquire**  
WV ATTORNEY GENERAL'S OFFICE  
Building 1, Room 26E  
1900 Kanawha Boulevard, East  
Charleston, WV 25305  
*Counsel for Intervenor State of W. Va.*

**Carl Solomon Charles, Esquire**  
LAMBDA LEGAL  
Suite 640  
730 Peachtree Street, NE  
Atlanta, GA 30308  
*Counsel for Plaintiff*

**Katelyn Kang, Esquire**  
COOLEY  
55 Hudson Yards  
New York, NY 10001  
*Counsel for Plaintiff*

**Avatara Antoinette Smith-Carrington,  
Esquire**  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND  
Suite 500  
3500 Oak Lawn Avenue  
Dallas, TX 75219  
*Counsel for Plaintiff*

**Julie Veroff, Esquire**  
COOLEY  
5th Floor  
101 California Street  
San Francisco, CA 94111  
*Counsel for Plaintiff*

**Taylor Brown, Esquire**  
American Civil Liberties Union  
125 Broad Street., 18<sup>th</sup> Floor  
New York, NY 10004  
*Counsel for Plaintiff*

**Curtis R. Capehart, Esquire**  
WV ATTORNEY GENERAL'S OFFICE  
Building 1, Room 26E  
1900 Kanawha Boulevard, East  
Charleston, WV 25305  
*Counsel for Intervenor State of W. Va.*

**David C. Tryon, Esquire**  
WV ATTORNEY GENERAL'S OFFICE  
Building 1, Room 26E  
1900 Kanawha Boulevard, East  
Charleston, WV 25305  
*Counsel for Intervenor State of W. Va.*

**Roberta F. Green, Esquire**  
**Anthony E. Nortz, Esquire**  
**Kimberly M. Bandy, Esquire**  
SHUMAN MCCUSKEY & SLICER  
P. O. Box 3953  
Charleston, WV 25339  
*Counsel for Defendant WVSSAC*

STEPTOE & JOHNSON PLLC  
OF COUNSEL

**Kelly C. Morgan, Esquire**  
**Kristen Vickers Hammond, Esquire**  
**Michael W. Taylor, Esquire**  
BAILEY & WYANT  
P. O. Box 3710  
Charleston, WV 25337-3710  
*Counsel for Defendant WVSBE and  
W. Clayton Burch*

**/s/ Susan L. Deniker**

Susan L. Deniker (WV ID #7992)  
400 White Oaks Boulevard  
Bridgeport, WV 26330-4500  
(304) 933-8000

*Counsel for Defendants Harrison County Board  
of Education and Dora Stutler*